

## COMPLAINT

## PARTIES

3. Upon information and belief, Defendant John Pike maintains a primary residence at 2357 Half Moon Way, Bullhead, Arizona 86442. Defendant is the maternal grandfather of Plaintiff Jane Doe.

## JURISDICTION

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\$75,000.

5. In 2007 or 2008, Defendant began to sexually abuse Plaintiff while visiting Plaintiff's immediate family at their home in Upton, Massachusetts. Defendant continued to physically abuse Plaintiff until she was ten years old, in or around 2010.

6. The first incident of abuse occurred when Plaintiff was seven or eight years old. Defendant engaged Plaintiff in a conversation about genitalia. Defendant then asked Plaintiff if she wanted to see his penis. Defendant proceeded to take Plaintiff to the upstairs hallway of the house and expose his penis to Plaintiff.

7. On multiple occasions during this time period, Defendant played a game with Plaintiff called "hide the penny." Defendant and Plaintiff would take turns hiding a penny on different places on their bodies. Defendant, on at least six occasions, hid the penny under the foreskin of his penis and encouraged Plaintiff to look for it under his shorts until she would find the penny under his foreskin. Defendant urged Plaintiff to be a "good sport" and to keep this activity secret.

8. On other occasions during this time period, Defendant told Plaintiff to do a headstand, at which point Defendant pulled Plaintiff's pants to her knees and performed oral sex on her, putting his mouth on and around her vulva and licking her with his tongue.

9. On another occasion during this time period, Defendant fondled Plaintiff's chest and encouraged Plaintiff to hold on to his penis.

10. On another occasion during this time period, Defendant kissed Plaintiff on the mouth and put his tongue inside her mouth.

11. Defendant's physical abuse of Plaintiff continued through several visits in 2009 to the family home in Centerville, including a visit around Columbus Day, a visit around

Thanksgiving, and a visit before Christmas.

12. After Defendant's physical abuse of Plaintiff ended, when Plaintiff was approximately ten years old, Defendant continued to make inappropriate comments to Plaintiff which forced Plaintiff to recall the prior physical abuse.

13. These incidents occurred on occasions when Plaintiff had been left in the care of Defendant.

14. The incidents were first discovered in January 2014.

15. On or about January 28, 2014, Defendant gave a full confession to the aforementioned acts to the Bullhead City Police Department in Bullhead City, Arizona.

16. On or about October 29, 2014, Defendant pleaded guilty to seven counts of indecent assault and battery on a child under the age of fourteen in the Worcester District Court in Massachusetts, based on the conduct.

17. As a direct result of the sexual abuse by Defendant, Plaintiff has suffered and continues to suffer severe emotional distress, embarrassment, anxiety, and other psychological injuries with attendant physical manifestations. These injuries have prevented and will continue to prevent her from performing her normal daily activities and obtaining the full enjoyment of life. As a result of these injuries, Plaintiff has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

**COUNT I: ASSAULT AND BATTERY**

18. Plaintiff repeats and incorporates the foregoing allegations as if fully set forth herein.

19. Between 2007 or 2008 and 2010, Defendant John Pike repeatedly inflicted unpermitted, harmful, and offensive sexual contact upon the person of the Plaintiff.

20. As a direct result of Defendant John Pike's wrongful conduct, Plaintiff has suffered the injuries alleged herein.

**COUNT II: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

21. Plaintiff repeats and incorporates the foregoing allegations as if fully set forth herein and further alleges the following.

22. Defendant John Pike intentionally inflicted emotional distress on Plaintiff through sexual abuse and through continued inappropriate comments after the physical abuse had ended.

23. As a direct result of Defendant John Pike's wrongful conduct, Plaintiff has suffered the injuries alleged herein.

**COUNT III: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

24. Plaintiff repeats and incorporates the foregoing allegations as if fully set forth herein and further alleges the following.

25. Defendant negligently inflicted emotional distress on Plaintiff through sexual abuse and through continued inappropriate comments after the physical abuse had ended.

26. As a direct result of Defendant's wrongful conduct, Plaintiff has suffered the injuries alleged herein.

**PRAYERS FOR RELIEF**

WHEREFORE, Plaintiff demands the following relief:

1. Issue an order impounding all pleadings and documents filed with the Court revealing Jane Doe's identity or actual name, or the identities or actual names of Jane Doe's parents or other minors;
2. Award to Plaintiff, damages of \$20,000,000 or another amount sufficient to compensate Plaintiff for her injuries, including but not limited to physical and psychological injuries, pain and suffering, emotional distress, medical expenses, and other damages;
3. Award to Plaintiff punitive or exemplary damages as permitted by law;

4. Award to Plaintiff attorneys' fees, interest, and costs as permitted by law; and
5. Award such other relief as the Court deems equitable and just.

**JURY REQUEST**

PLAINTIFF DEMANDS A JURY TRIAL ON ALL COUNTS SO TRIABLE.

Respectfully submitted,

/s/Chris Hennessey

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**ATTORNEYS FOR PLAINTIFF**

May 1, 2015